

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

DYSON TECHNOLOGY LIMITED and )  
DYSON, INC., )

Plaintiffs, )

v. )

C.A. No. 05-434-GMS

HOOVER, INC., HOOVER GENERAL )  
L.L.C., HOOVER LIMITED L.L.C., )  
HOOVER COMPANY I, L.P. and )  
MAYTAG CORPORATION, )

Defendants. )

**JOINT PROPOSED SPECIAL VERDICT FORM (PATENT)**

WE, THE JURY, unanimously find as follows:

**I. INFRINGEMENT**

1. Do you find by a preponderance of the evidence that the Hoover “Fusion” vacuum cleaner infringes the following claim of the ‘515 patent? (A “yes” answer to this question is a finding for Dyson. A “no” answer is a finding for Hoover.)

Claim 14      Yes \_\_\_\_\_      No \_\_\_\_\_

2. Do you find by a preponderance of the evidence that Hoover “Fusion” vacuum cleaner infringes the following claims of the ‘748 patent? (A “yes” answer to this questions is a finding for Dyson. A “no” answer is a finding for Hoover.)

Claim 15      Yes \_\_\_\_\_      No \_\_\_\_\_

Claim 16      Yes \_\_\_\_\_      No \_\_\_\_\_

Claim 17      Yes \_\_\_\_\_      No \_\_\_\_\_



3. Do you find by a preponderance of the evidence that the Hoover "Fusion" vacuum cleaner infringes the following claims of the '008 patent? (A "yes" answer to this question is a finding for Dyson. A "no" answer is a finding for Hoover.)

Claim 1	Yes _____	No _____
Claim 2	Yes _____	No _____
Claim 3	Yes _____	No _____
Claim 7	Yes _____	No _____
Claim 11	Yes _____	No _____
Claim 23	Yes _____	No _____
Claim 24	Yes _____	No _____
Claim 25	Yes _____	No _____

## II. DAMAGES

4. The parties have agreed to the number of units sold and Hoover's net revenue from sale of the accused product. If you have found that the Hoover "Fusion" vacuum cleaner infringes at least one of the claims of the patents in suite, what percentage of Hoover's net revenue is Dyson entitled to as a reasonable royalty rate for Hoover's infringement?

Royalty Rate % \_\_\_\_\_



**III. WILLFUL INFRINGEMENT**

5. If you have found that the Hoover "Fusion" vacuum cleaner infringes at least one of the claims of any of the patents in suit, do you find that Dyson has proven by clear and convincing evidence that Hoover's infringement was willful? (A "yes" answer to this question is a finding for Dyson. A "no" answer is a finding for Hoover.)

Yes \_\_\_\_\_ No \_\_\_\_\_

**WHEN THE JURY HAS REACHED A VERDICT, THE FOREPERSON MUST SIGN THIS VERDICT FORM AND SIGNAL THE U.S. MARSHALL THAT THE JURY IS READY TO RENDER A VERDICT.**

Date: \_\_\_\_\_

\_\_\_\_\_  
Jury Foreperson